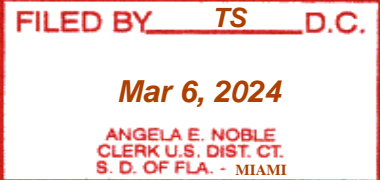


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:24-mj-02454-Reid



IN RE SEALED COMPLAINT.  
\_\_\_\_\_ /

**CRIMINAL COVER SHEET**

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No
3. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the United States Attorney's Office, which concluded on January 22, 2023? No

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

BY:

A handwritten signature in black ink, appearing to read "B. Dobbins", is written over a horizontal line.

BRIAN DOBBINS  
Assistant United States Attorney  
Federal Bar No. A5501182  
99 Northeast 4<sup>th</sup> Street  
Miami, FL. 33132-2111  
Tel: (305) 961-92304  
Brian.Dobbins@usdoj.gov

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of Florida

United States of America

v.

MICHAEL DULFO,  
JERREN HOWARD, and  
Edner Etienne,*Defendant(s)*

Case No. 1:24-mj-02454-Reid

## CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

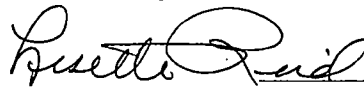
On or about the date(s) of July 2, 2022 and through August 30, 2023 in the county of Miami- Dade in the  
Southern District of Florida, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. §§ 844(h) and 2  
18 U.S.C. §§ 844(i) and 2  
18 U.S.C. §§ 1952 and 2  
18 U.S.C. §§ 2261A(2) and 2Arson/Use of Fire to commit a felony;  
Arson;  
Use of Interstate Facilities in Aid of Racketeering; and  
Stalking.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.*Complainant's signature*Joseph Dalessio, Special Agent, FBI*Printed name and title*Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time

Date:

3/6/2024*Judge's signature*

City and state:

Miami, FloridaHon. Lisette M. Reid, United States Magistrate Judge*Printed name and title*

**AFFIDAVIT**

I, Joseph Dalessio, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation and have been since January 2019. I am presently a member of the FBI Miami Field Division Violent Crimes and Fugitive Task Force. My duties and responsibilities include conducting criminal investigations of individuals and entities for possible violations of federal laws, particularly those laws found in Title 18 of the United States Code. I have previously participated in investigations which resulted in the arrests, searches, and seizures of individuals and property. In the course of my career with the FBI, I have participated in the use of cooperating informants, undercover agents, pen register/trap and trace devices, video surveillance, wiretaps, GPS tracking devices, search warrants, and audio surveillance, among other law enforcement techniques. Based on my training and experience, I am familiar with methods used by the criminal element to further a variety of criminal activities.

2. I submit this Affidavit in support of a criminal complaint charging Michael DULFO and Jerren HOWARD with the use of fire to commit a felony, in violation of Title 18, United States Code, Sections 844(h) and 2; arson, in violation of Title 18, United States Code, Sections 844(i) and 2; and the use of an interstate facility in aid of racketeering enterprises, in violation of Title 18, United States Code, Sections 1952 and 2. The complaint also charges Michael DULFO, Jerren HOWARD, and Edner ETIENNE with stalking, in violation of Title 18, United States Code, Sections 2261A(2) and 2.

3. This Affidavit is based upon my personal knowledge, my review of documents and other evidence, and my conversations with other law enforcement personnel and civilian

witnesses. Because this Affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Rather, I have included only the facts that are sufficient to establish probable cause. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

**PROBABLE CAUSE**

***The Hit and Run***

4. On or about August 30, 2023, law enforcement responded to the address of VICTIM 1 in Miami-Dade County (hereinafter “VICTIM 1’s RESIDENCE”), for a hit and run incident in which a Home Depot flatbed-style pick-up truck rammed into the side of a vehicle operated by VICTIM 1. It was reported that after the incident occurred, the truck and operator fled the scene. The incident was captured on VICTIM 1’s home video surveillance system. Law enforcement viewed the video of the incident, which revealed that the Home Depot truck arrived in front of VICTIM 1’s RESIDENCE at approximately 4:10 PM, before moving a short time later to park closer to the driveway of VICTIM 1’s RESIDENCE, for no apparent reason. As VICTIM 1’s vehicle pulled into the driveway of VICTIM 1’s RESIDENCE at approximately 4:12 PM, the Home Depot truck was put into reverse, circling around from behind VICTIM 1’s vehicle into the front yard at an increasing rate of speed to strike the passenger side of VICTIM 1’s vehicle with the flatbed area of the truck. The Home Depot truck then drove away. It appeared from the video that the Home Depot truck did not have a license plate affixed to the rear of the truck. Based upon the circumstances, including the increasing rate of speed and the route the Home Depot truck took while reversing, it was apparent that this was an intentional act and not an accidental collision.

5. A subsequent investigation into the hit and run incident revealed that the Home Depot truck that was used was rented on or about August 30, 2023, from the Home Depot located in the Coconut Grove area of Miami, and later reported stolen on or about September 4, 2023. Law Enforcement spoke with Home Depot personnel who provided a receipt for the vehicle transaction, which was a Home Depot flatbed truck with Florida License Plate Number 61BMVM. The rental paperwork revealed that Home Depot truck was rented by an uncharged individual (hereinafter, "SUBJECT 1") at approximately 10:20 AM on August 30, 2023. An employee of Home Depot informed law enforcement that SUBJECT 1 may have been associated with another individual, later identified as Edner ETIENNE, wearing a dark-colored t-shirt with a white, long-sleeve undershirt and dark pants.

6. Law enforcement reviewed video surveillance footage from the Home Depot in Coconut Grove for August 30, 2023. At approximately 10:12 AM, SUBJECT 1 pulled into a parking space operating a gray Tesla sedan. A dark-colored Chevrolet Silverado pick-up truck, later identified as registered to Michael DULFO as described in more detail below, then arrived and parked in a spot to the rear of the Tesla. SUBJECT 1 then exited the Tesla and entered the store. Approximately three minutes later, an individual wearing a dark-colored shirt with a white, long-sleeve undershirt and dark pants exited from the passenger side of DULFO's Silverado and entered the store. A comparison of ETIENNE's photographs and the images from the surveillance video confirmed that ETIENNE closely resembled the individual wearing the dark-colored shirt with the white, long-sleeve undershirt.

7. The Home Depot surveillance footage also showed SUBJECT 1 walking towards the area of the Home Depot parking lot where the rental trucks are kept. SUBJECT 1 then walked back towards the front entrance of the store and then re-entered the store, before exiting a short

time later. SUBJECT 1 then approached the passenger side of DULFO's Silverado and appeared to be talking to someone inside the Silverado. At the same time, ETIENNE exited the Home Depot and entered the Silverado. SUBJECT 1 then returned to the Tesla and drove off. DULFO's Silverado then drove over towards the area of the parking lot where the rental trucks were located where it is obstructed from security camera view, and then an individual, who cannot be identified because of video quality, walked from that area to a Home Depot truck. A short time later, DULFO's Silverado drove away, followed by a Home Depot flatbed truck. The walking unidentified individual is not seen leaving that area of the Home Depot parking lot.

8. Law enforcement canvassed the area around VICTIM 1's RESIDENCE for additional surveillance footage. Law enforcement was able to discover additional video cameras that pointed towards the street where VICTIM 1's RESIDENCE was located. That video footage showed the Home Depot truck driving towards VICTIM 1's RESIDENCE, and the driver of the Home Depot truck was observed to be wearing clothing similar in style and color, specifically a dark-colored shirt with a white, long-sleeve undershirt, to the clothing ETIENNE was wearing at the Home Depot in Coconut Grove earlier that day.

9. Law Enforcement then conducted License Plate Reader (LPR) database checks of the Home Depot truck, bearing Florida License Plate Number 61BMVM, in order to attempt to ascertain its last known location. A LPR check revealed that the Home Depot truck was observed on or about September 4, 2023, at approximately 2:27 AM in the area of 9302 NW 2<sup>nd</sup> Place, Miami, Florida. On or about Friday, September 8, 2023, law enforcement responded to the area of 9302 NW 2<sup>nd</sup> Place and observed a Home Depot flatbed style truck that appeared to be abandoned on the side of the road. Law enforcement noted it had marks and damage on the rear portion of the vehicle that was consistent with the point of impact observed on video in which

VICTIM 1's vehicle was struck on or about August 30, 2023 in Pinecrest.<sup>1</sup> ETIENNE's listed address in the Florida Driver and Vehicle Information Database ("DAVID") is on NW 93<sup>rd</sup> street, approximately 0.7 miles from where the Home Depot truck was recovered<sup>2</sup>.

***Identification of DULFO's Silverado***

10. Due to the timing of the ramming occurring as VICTIM 1 was arriving home, law enforcement conducted a License Plate Reader (LPR) query of the registration of VICTIM 1's vehicle. The query revealed that on or about August 30, 2023, at approximately 3:50:26 PM, VICTIM 1's vehicle was observed traveling south on South Dixie Highway, in the area of 5th Street. This location was consistent with the route that VICTIM 1 provided to Law Enforcement as the route she utilized to travel to VICTIM 1's RESIDENCE from an appointment. At approximately 3:50:29 PM, Law Enforcement noted a dark-colored Chevrolet Silverado, bearing Florida License Plate Number C75UP, traveling in the area behind VICTIM 1's vehicle. A Florida DAVID query revealed that the Silverado with that license plate number was a 2014 Chevrolet Silverado, listed as brown in color and registered to DULFO.<sup>3</sup> The Florida License Plate that was

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<sup>1</sup> Law Enforcement recovered the Home Depot truck with store assigned numbers affixed to the front left and right hood area. It appears from surveillance video from VICTIM 1's surveillance video and from the neighbors' video footage that these numbers are not present or cannot be observed due to video quality.

<sup>2</sup> Law Enforcement obtained GPS data associated to the recovered Home Depot truck. According to Home Depot the GPS only collects data when the truck is shut off. The GPS does not place the truck at VICTIM 1's RESIDENCE, however the truck was located at 231 SE 1<sup>st</sup> Place, Miami, at approximately 10:54 AM for 2 hours and 3 minutes. This location is approximately 0.6 driving miles from the location of VICTIM 1's appointment.

<sup>3</sup> Law Enforcement observed a sticker on the top left portion of the rear window of the SUBJECT SILVERADO. This sticker was not previously observed on any surveillance footage, nor on or about the September 14, 2023, surveillance that was conducted at DULFO's registered address.

assigned to the vehicle was a black Florida specialty University of Central Florida plate with white-colored lettering.

11. The Silverado observed in the Home Depot parking lot on August 30, 2023, had a cover on the flatbed area of the truck, a trailer hitch, and a black license plate that had white lettering, with the first letter "C." Law enforcement conducted surveillance at DULFO's listed residence in DAVID on September 14, 2023, and observed DULFO'S truck to have a flatbed cover and trailer hitch, in addition to the black University of Central Florida license plate with white lettering. On multiple occasions since September 14, 2023, law enforcement surveillance has observed DULFO operating the Silverado.

#### *The Arsons*

12. Since July of 2022, several law enforcement agencies have been assisting in the investigation of two separate vehicle arsons of VICTIM 1's sister, hereinafter, "VICTIM 2." The arsons occurred at VICTIM 2's Residence in Miami-Dade County, hereinafter "VICTIM 2's RESIDENCE," on or about July 2, 2022, and on or about August 12, 2023. As a result of the arsons, personal property, including but not limited to, three vehicles, portion(s) of the residence located at VICTIM 2's RESIDENCE, and other effects were damaged or destroyed.

13. On or about July 2, 2022, home video surveillance footage from VICTIM 2's RESIDENCE showed that at approximately 3:26 AM, a subject wearing a hooded sweatshirt and shorts, hereinafter, "SUBJECT 2," walked from west to east, towards the area of one of VICTIM 2's vehicles, a 2019 Dodge Ram. A short time later, at approximately 3:27 AM, a bright orange flash can be seen on the video, and SUBJECT 2 then ran towards another vehicle, a 2019 Chevrolet Tahoe, that is parked on the west side of the driveway of VICTIM 2's RESIDENCE. In an interview of VICTIM 2's husband, VICTIM 2's husband stated that the Ram was utilized as a



vehicle in part for sales of a building materials company engaged in interstate commerce. VICTIM 2 also worked from home at VICTIM 2's RESIDENCE. VICTIM 2 also utilized the Tahoe to travel to and from her work at a telecom company that is engaged in interstate commerce.

14. SUBJECT 2 then poured a liquid from a red colored container on the hood of the Tahoe. SUBJECT 2 then appeared to light something on fire and place the lit object near the hood and windshield area of the Tahoe. A flash of fire was seen, and the Tahoe became engulfed in flames. Due to the angle of the surveillance video, it is unclear which direction SUBJECT 2 departed after the Tahoe became engulfed. City of Miami Fire and Police Departments then responded to the scene and began an investigation into the circumstances surrounding the fires.

15. On or about August 12, 2023, VICTIM 2's RESIDENCE was the scene of another vehicle arson. At approximately 3:34 AM, home video surveillance footage from the VICTIM 2's RESIDENCE showed a subject, hereinafter "SUBJECT 3," walking from the west towards the east in front of VICTIM 2's RESIDENCE. SUBJECT 3 appeared to be carrying an object that is by SUBJECT 3's side while walking west, out of view of the camera angle. The object is consistent with a gas container.

16. At approximately 3:34 AM, video from a different home video surveillance footage angle from VICTIM 2's RESIDENCE showed one of the vehicles engulfed in flames, a 2019 Chevrolet Silverado, and an individual matching the description of SUBJECT 3. It appeared from the video that SUBJECT 3 became partially engulfed in flames and ran away from the burning Silverado, fleeing westbound from VICTIM 2's RESIDENCE. Other video footage from a neighboring residence shows an individual matching that description of SUBJECT 3 fleeing north a short time later, still carrying a container at approximately 3:35 AM.

17. City of Miami Police and Fire Department personnel were again dispatched to VICTIM 2's RESIDENCE. A neighborhood canvas was conducted by City of Miami Police Detectives for more video pertaining to the incident. A review of video surveillance footage located in the vicinity of VICTIM 2's RESIDENCE, from on or about August 12, 2023, captured a dark-color Chevrolet Silverado pick-up truck, similar in appearance to DULFO's Silverado, operating in the area of VICTIM 2's RESIDENCE. This Silverado was observed on video in the area prior to the arson at approximately 3:15 AM, 3:24 AM, and 3:25 AM. It should be noted that according to residential video surveillance, the arson occurred at approximately 3:34 AM.

***Identifying Cellphones used by DULFO and HOWARD***

18. FBI Miami has a Confidential Human Source (CHS) that has previously reported information pertaining to DULFO and another individual named Jerren HOWARD, to include information regarding their cellphone numbers. The CHS has been proven to be a reliable source of information in the past. The CHS identified a phone number ending in 9404, hereinafter, "DULFO's 9404 PHONE," as a phone number that DULFO used. The CHS also identified a phone number ending in 1029, hereinafter, "HOWARD's 1029 PHONE," as phone number that HOWARD used. Records obtained from Venmo, a cash transfer application, revealed that the DULFO 9404 PHONE was a phone number associated with DULFO's account. A search of public databases revealed that the HOWARD 1029 PHONE was associated with HOWARD, with the correct date of birth and social security number as HOWARD. Throughout the investigation, Law Enforcement obtained information to include the review of cellphone communication records, financial transactions, and confidential human source information, which provided sufficient evidence that implicated HOWARD, in at least some of the above listed criminal activity.

*Historical Location Information*

19. On or about October 20, 2023, a historical cell site location search warrant for the DULFO 9404 PHONE was granted by the Honorable United States Magistrate Judge Eduardo Sanchez. On or about November 9, 2023, a historical and prospective date cell site location search warrant for the phone number associated for the HOWARD 1029 PHONE, was granted by the Honorable United States Magistrate Judge Alicia M. Otazo-Reyes.

20. Upon receiving the data from the telephone providers for the telephone numbers and respective devices associated to DULFO and HOWARD, Law Enforcement utilized the assistance of FBI Cellular Analysis Survey Team (CAST).

21. A preliminary CAST report indicated that the DULFO 9404 PHONE utilized cell phone tower(s) in the vicinity of VICTIM 2's RESIDENCE on or about July 2, 2022, at approximately 3:20 AM, and 3:29 AM. The CAST report also indicated that the HOWARD 1029 PHONE was in the general vicinity of VICTIM 2's RESIDENCE at approximately 3:12 AM, utilizing a tower that was approximately one quarter mile from VICTIM 2's RESIDENCE at that time. The time of the arson was at approximately 3:27AM.

22. A preliminary CAST report indicated that the DULFO 9404 PHONE utilized a cell tower in the vicinity of VICTIM 2's RESIDENCE on or about August 12, 2023, at approximately 3:26 AM. The time of the arson was at approximately 3:34 AM.

23. A preliminary CAST report indicated that the DULFO 9404 PHONE and the HOWARD 1029 PHONE both utilized cell tower(s) in the vicinity of the Coconut Grove Home Depot on or about August 30, 2023, around the time that the Home Depot truck was rented by SUBJECT 1. Specifically, the DULFO 9404 PHONE utilized a tower in the vicinity of the Home

Depot at approximately 10:40 AM, and the HOWARD 1029 PHONE utilized a tower in the vicinity of the Home Depot several times between 10:14 AM and 10:38 AM.

24. The DULFO 9404 PHONE utilized a cell phone tower in the vicinity of the hit and run location at VICTIM 1's RESIDENCE, around the approximate time the hit and run took place. The CAST analysis did not have mappable data to support the location of the device associated to the HOWARD 1029 PHONE during the approximate time of the hit and run incident at VICTIM 1's RESIDENCE on or about August 30, 2023.

#### ***TOLL RECORD ANALYSIS***

25. Law Enforcement obtained phone records, including but not limited to subscriber information and call detail records, for ETIENNE, the DULFO 9404 PHONE, and the HOWARD 1029 PHONE. A review of the toll records for the HOWARD 1029 PHONE on or about July 2, 2022, the morning of the first arson, revealed that at approximately 1:32 AM, 1:53 AM, and 2:06 AM, there were three different communications between the HOWARD 1029 PHONE and the DULFO 9404 PHONE.

26. A review of the toll records for the HOWARD 1029 PHONE, on or about August 12, 2023, the morning of the second arson at VICTIM 2's RESIDENCE, revealed that at approximately 12:10AM, 12:27 AM, and at 5:13 AM, there were three different communications between the HOWARD 1029 PHONE and the DULFO 9404 PHONE.

27. A further review of the toll records on or about August 30, 2023, revealed that the HOWARD 1029 PHONE communicated a total of approximately forty-eight (48) times with a phone number ending in 7908, believed to be associated with ETIENNE. Law enforcement review of public source databases revealed that the 7908 phone number was associated with ETIENNE, and Text Now subscriber information came back to a "King Etienne," and a username of

“EtienneKing55.” The HOWARD 1029 PHONE and the 7908 phone number believed to be associated to ETIENNE exchanged approximately twenty-six (26) calls and approximately ten (10) text messages between approximately 10:26 AM and 4:42 PM on August 30, 2023, which includes an approximate 17-minute call at 4:42 PM. Based upon analysis conducted by Law Enforcement, the 7908 phone number believed to be associated to ETIENNE first communicated with the HOWARD 1029 PHONE on or about February 21, 2023, but the communications that occurred on or about August 30, 2023, account for approximately twenty-seven (27%) percent of the total communications between the two numbers since February 21, 2023.

#### ***Cash App Financial Transactions***

28. Law enforcement issued several financial-related subpoenas, to include subpoenas to mobile money service businesses such as “Cash App,” a money transfer application. A review of the Cash App subpoena return was conducted, and it revealed further contacts and financial transactions between DULFO, HOWARD, and ETIENNE. Cash App verified that DULFO had an account with Cash App, which was registered in DULFO’s name, correct date of birth, and the correct last four digits of his Social Security number.

29. A review of the Cash App information for DULFO’S Cash App account revealed that on or about August 30, 2023, at approximately 21:07:53 Universal Time Coordinated (UTC),<sup>4</sup> which converts to approximately 5:07:53 PM Eastern Standard Time (EST), DULFO’s Cash App account sent \$200 to a ETIENNE’s name as recipient. This transaction took place less than approximately one hour after the hit and run incident took place at VICTIM 1’s RESIDENCE.

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<sup>4</sup> UTC time is four hours ahead of the Eastern Time Zone in the United States during Daylight Savings Time, and five hours ahead when Daylight Savings Time is not in effect.

30. A further review of the transaction history revealed that, on or about August 31, 2023, at 1:25:32 UTC, which converts to August 30, 2023, at approximately 9:25 PM, the DULFO Cash App account attempted to send \$800 to ETIENNE. The Cash App status indicated that "Bill\_Getter\_Refused." This attempted transaction took place approximately five hours after the hit and run incident at VICTIM 1's RESIDENCE. A review of other transactions for DULFO's Cash App account from April 21, 2021, to October 29, 2023, revealed only one other transaction with ETIENNE, which was a twenty-five dollar (\$25) request to ETIENNE on September 28, 2023 at 3:34:52 UTC. The Cash App records indicated that the status was "Expired\_Waiting\_on\_Sender."

31. A further examination revealed that the DULFO Cash App account also conducted transactions with an account username of "OMERTA BLOODY." Law Enforcement was able to determine, based on a subpoena to Cash App, that HOWARD was listed as the name on the account for "OMERTA BLOODY." One of the phone numbers associated with the Cash App account for "OMERTA BLOODY," was the HOWARD 1029 PHONE. One of the email addresses provided for the OMERTA BLOODY Cash App account was also the same name as the listed subscriber for the HOWARD 1029 PHONE.

32. Law Enforcement further discovered a transaction between the DULFO Cash App account and HOWARD's OMERTA BLOODY Cash App account that occurred on or about August 11, 2023, at approximately 11:21 PM, in which DULFO's Cash App account sent fifty (\$50) dollars to HOWARD's Cash App account. Law Enforcement focused on this transaction

because it was just hours prior to the second arson that occurred on August 12, 2023, at VICTIM 2'S RESIDENCE.<sup>5</sup>

*Search Warrant on DULFO'S iCloud Accounts*

33. On or about November 22, 2023, the Honorable Lisette M. Reid, United States Magistrate Judge for the Southern District of Florida, granted a search warrant for Apple iCloud accounts associated with DULFO.

34. During the review of the iCloud DULFO account returns, law enforcement was able to recover, including but not limited to, IOS I Messages/SMS/MMS and IOS WhatsApp Messages as a result of the search warrant extraction. These included communications between the DULFO 9404 PHONE and two different telephone numbers associated to HOWARD, including the HOWARD 1029 PHONE. DULFO had the phone number for the HOWARD 1029 PHONE saved as "BLOOD" in the Apple Contacts section of the return.

35. On or about August 12, 2023 at approximately 12:35:37 AM, DULFO'S 9404 PHONE sent a message was to the HOWARD 1029 PHONE stating, "Yoooo." Then at approximately 12:35:40 AM, another message was sent from the DULFO 9404 PHONE to the HOWARD 1029 PHONE stating, "Outside." These messages were sent approximately three hours prior to the second arson at VICTIM 2's RESIDENCE on August 12, 2023.

36. The DULFO iCloud search warrant return also included several other items of evidentiary value that suggest that DULFO was stalking VICTIM 1. For example, law enforcement recovered a picture of a piece of paper with the address of VICTIM 1's RESIDENCE

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<sup>5</sup> Law enforcement observed other transactions between the DULFO Cash App account and the OMERTA BLOODY account associated with HOWARD, with dates that at the time of this Affidavit, have no known significance to law enforcement.

written on it. Law enforcement is unable to determine if the picture was taken by a device utilized by DULFO or if it was sent to him by someone else. The date of creation listed for the picture is December 28, 2022, which is approximately eight months before the hit and run at VICTIM 1's RESIDENCE.

37. Law enforcement also recovered what appeared to be a Google Maps picture of a street view of VICTIM 1's RESIDENCE. The last modified date of this picture is listed as August 22, 2023. Law enforcement is unable to determine if the picture was sent to DULFO or if it originated on a device utilized by DULFO.



38. Based upon the above-described evidence, your Affiant submits that there is probable cause to believe that DULFO and HOWARD committed the crimes of the use of fire to commit a felony, in violation of Title 18, United States Code, Sections 844(h) and 2; arson, in violation of Title 18, United States Code, Sections 844(i) and 2; and the use of interstate facilities in aid of racketeering enterprises, in violation of Title 18, United States Code, Sections 1952 and 2. Your affiant further submits that there is probable cause to believe that DULFO, HOWARD, and ETIENNE committed the crime of stalking, in violation of Title 18, United States Code, Sections 2261A(2) and 2.

**FURTHER AFFIANT SAYETH NAUGHT.**

  
\_\_\_\_\_  
JOSEPH DALESSIO  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1  
by Face time this 6th day of March, 2024.

  
\_\_\_\_\_  
HONORABLE LISETTE M. REID  
UNITED STATES MAGISTRATE JUDGE